REMARKS

Claims 16-30 remain in this application. None of the claims were amended in this response. Favorable reconsideration is respectfully requested.

Claims 16-30 were rejected under 35 U.S.C. §102(e) as being anticipated by *Noy* (US Patent 6,628,623). Applicant respectfully traverses this rejection.

Specifically, the cited art, alone or in combination, fails to teach the features of "checking, via the address conversion apparatus, whether the transmitted fictitious hardware address matches a stored fictitious hardware address stored in a memory of the address conversion apparatus; assigning the data an address information item, if a result of the check is positive, which is associated with the transmitted fictitious hardware address in the address conversion apparatus; identifying, via the address information item, the destination network device ; and using the address information item to forward the data to the destination network device" as recited in claim 16 and similarly recited in claim 25.

In contrast, Noy teaches a switch connection topology, where:

a) a communications link is established between a network management server and a switch in an Ethernet LAN, defined as a root switch;

b) each of a plurality of switches attached to the Ethernet LAN are identified by a MAC address;

c) packets are sent to each of the plurality of switches, including a unique fake MAC address;

d) mapping is generated of each of the switches, including a list for each of the switches the fake MAC addresses that each of the switches sees; and

e) identifying in the mapping at least one leaf, a leaf being any of the switches that sees only one fake MAC address (col. 1., lines 34-48).

Furthermore, *Noy* teaches that the above process is repeated until all leaves are found (col. 1, lines 51-52; col. 3, lines 1-25). However, Noy is completely silent regarding forwarding the data for transmission to a destination network device, and further does not teach nor suggest using address information to forward the data – the fake MAC address represents the source address of the packet (col. 2, lines 52-56). Also, Noy fails to teach an address conversion apparatus for performing the steps to transmit the data in the present claims. The mapping
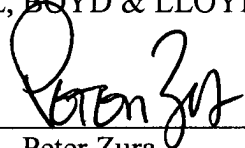
disclosed in Noy teaches that the <u>switches</u> are populated with fake MAC addresses that the switch is designed to see (col. 2, lines 52-64). Once the source MAC addresses are sent, only those that are recognized <u>at the switch</u> are routed through (col. 3, lines 15-25).

In light of the above, Applicants respectfully submit that claims 16-30 are in condition for allowance, which is respectfully requested. The Commissioner is authorized to charge and credit Deposit Account No. 02-1818 for any additional fees associated with the submission of this Response, including any time extension fees. Please reference docket number 112740-376.

Respectfully submitted,

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